

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

RICHARD MA and FRED DEVEREAUX,
individually and on behalf of all others
similarly situated,

Plaintiffs,

v.

MAPFRE U.S.A. CORP. and THE
COMMERCE INSURANCE COMPANY,

Defendants.

Case No.: 1:23-cv-12059-IT

**JOINT STIPULATION TO EXTEND TIME
TO RESPOND TO CLASS ACTION COMPLAINT**

IT IS HEREBY STIPULATED and AGREED by and between undersigned counsel,
pursuant to Federal Rule of Civil Procedure 6(b), that:

1. Defendants MAPFRE U.S.A Corporation's and The Commerce Insurance Company's ("Defendants") time to answer, move, or otherwise respond to Plaintiffs' Class Action Complaint filed on or about September 6, 2023 ("Complaint") and served on September 12, 2023, is extended from October 3, 2023 to November 17, 2023.

2. Good cause exists for the agreed extension because Plaintiffs have filed an unopposed Motion to Consolidate multiple related putative class actions brought against Defendants in this Court (Dkt. No. 9). That motion also requests a deadline for Plaintiffs to file a Consolidated Complaint and for Defendants to file a responsive pleading to the Consolidated Complaint.

3. This stipulation does not constitute a waiver of any claim, right or defense.

Dated: October 2, 2023

Respectfully submitted,

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